

Exhibit 1

From: Kristen Johnson <kristenj@hbsslaw.com>
Sent: Wednesday, July 23, 2014 8:51 AM
To: Braceras, Roberto M; Chris J. Tardio; Puig, Yvonne K.; Matt H. Cline; C. J. Gideon; Jay Blumberg
Cc: Ben Gastel; Edward Notargiacomo
Subject: NECC: Motion to Deem Amended

You are receiving this email as counsel for an entity that was named in a number of short form complaints.

The PSC intends to file a motion asking the Court to deem amended all short form complaints where the plaintiff indicated that they would amend their complaint to bring a claim under 93A (or similar consumer protection statute) once the required notice period ran. As you may recall, there was a specific check box and blank on the short form complaints addressing this issue.

The impetus for the motion is pure administrative efficiency: It saves the Court from having to rule on dozens (I'm estimating, I haven't personally counted) of motions to amend. And it saves plaintiffs' lawyers from having to incur time preparing motions to amend.

The amendment would not waive any objections as to whether the notice itself was inadequate, whether the elements of a 93A claim have been adequately alleged, etc.

Please advise us by the close of business today, **Wednesday, July 23**, if you do not oppose the motion.

Kristen Johnson | Partner
Hagens Berman Sobol Shapiro LLP
55 Cambridge Parkway, Suite 301 - Cambridge, MA 02142
Direct: (617) 475-1961
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Named to 2013 Plaintiff's Hot List by *The National Law Journal*



From: Matt H. Cline
Sent: Thursday, July 24, 2014 8:22 AM
To: 'Kristen Johnson'
Cc: Ben Gastel; Edward Notargiacomo; Chris J. Tardio; C. J. Gideon
Subject: RE: NECC: Motion to Deem Amended

Kristen,

We will assent to the motion if the PSC will (1) send us a list of suits that are being amended and (2) confirm that the amendments are not adding any new claims against our clients.

Please feel free to call if you would like to discuss.

Thanks.

Matt

Matthew H. Cline
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Nashville, TN 37238
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Fax: (615) 254-0459
matt@gideoncooper.com

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